

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMANDA ARNOLD,
Plaintiff,

Civil Action No.: 17-10432-DJC

VS.

**THE WOODS HOLE, MARTHA'S
VINEYARD AND NANTUCKET
STEAMSHIP AUTHORITY,**
Defendant.

**DEFENDANT'S MOTION IN LIMINE TO PRECLUDE
EVIDENCE OF SURREPTITIOUS PHOTOGRAPHS AND VIDEO**

Now comes the defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority (hereinafter the "Steamship Authority"), in the above captioned civil action, by and through its undersigned counsel, Clinton & Muzyka, P.C., and hereby submits its Motion In Limine to Preclude Evidence of Surreptitious Photographs and Video.

Plaintiff has provided a number of photographs and videos taken surreptitiously onboard the M/V EAGLE in May of 2017. Plaintiff, however, never identified the person who took these photographs and video during discovery. Plaintiff testified at her deposition that she did not know who took the photographs and video. Because Defendant was deprived of the opportunity to depose the individual(s) who obtained these photographs and video, the photographs and video should be precluded from evidence at trial.

WHEREFORE, Defendant respectfully moves this Honorable Court that all photographs and video obtained surreptitiously be precluded from evidence at trial.

By its attorneys,
CLINTON & MUZYKA, P.C.

/s/ Olaf Aprans

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CERTIFICATE OF SERVICE

Pursuant to Local Rule 5.2, I hereby certify that the above document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on December 17, 2018.

/s/ Olaf Aprans

Olaf Aprans